

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No: 1:22-cv-22538 (Altman/Reid)

PIERCE ROBERTSON, RACHEL GOLD,
SANFORD GOLD, RAHIL SAYED,
CHRISTOPHER EHRENTRAUT, TODD
MANGANIELLO, DAN NEWSOM, WILLIAM
AYER, ANTHONY DORN, DAMECO GATES,
MARSHALL PETERS, and EDWIN GARRISON,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

MARK CUBAN, et al.

Defendants.

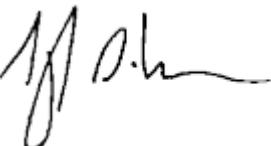
**REPLY DECLARATION OF SIGMUND S. WISSNER-GROSS IN SUPPORT OF
DEFENDANTS MARK CUBAN'S AND DALLAS BASKETBALL MOTION FOR
SANCTIONS UNDER 28 U.S.C. § 1927**

I, Sigmund S. Wissner-Gross, Esq. under penalty of perjury, state as follows:

1. I am a partner with Brown Rudnick LLP and have been admitted *pro hac vice* to practice before this Court. I am counsel for Defendants Mark Cuban (“Mr. Cuban”) and Dallas Basketball Limited d/b/a Dallas Mavericks (the “Mavericks”) in the above referenced matter. I submit this Declaration in support of Mr. Cuban and the Mavericks’ Motion for Sanctions pursuant to 28 U.S.C. § 1927. Except as otherwise indicated, I submit this Declaration based on personal knowledge.

2. On December 29, 2022, Defendants received a production of documents from Voyager, which included documents relating to Rachel Gold. Such documents indicated that Rachel Gold did not open a customer account with Voyager in her own name, and that, according to such documents, Voyager had declined to open such an account due to [REDACTED] [REDACTED] .” ECF No. 92-2 (under seal). Defendants’ counsel asked Plaintiffs’ counsel, including Adam Moskowitz and Howard Bushman, if Plaintiffs’ counsel would confirm whether, as it appeared, Ms. Gold at no point was a customer of Voyager. Plaintiffs’ counsel confirmed on a call with Defendants’ counsel, including the undersigned, that Ms. Gold in fact had not opened a Voyager account in her name and that her husband, [REDACTED] [REDACTED] . Further, on December 30, 2022, Adam Moskowitz similarly confirmed via email that it was Mr. Rares, not Ms. Gold, who was a “named account holder” at Voyager.

Executed this 31st of May, 2023 in New York, New York

By: 

Sigmund S. Wissner-Gross